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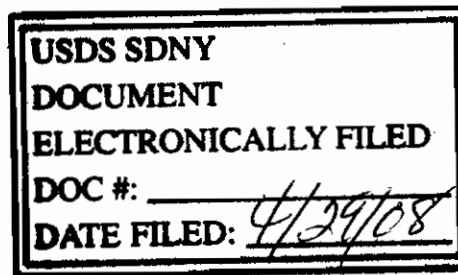
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MEMO ENDORSED

April 29, 2008

VIA FAX: (212) 805-7930

Honorable James C. Francis IV
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1960
New York, NY 10007



Re: Nelson v. Roehrig Maritime LLC, et ano
07 CV-6037 (JCF)

Dear Judge Francis:

We represent plaintiff in the captioned action and write jointly with Edward P. Flood, Esq. of Lyons & Flood, LLP, attorneys for defendants, to respectfully request a thirty (30) day extension of the dates for completion of expert disclosure. Currently, plaintiff's expert disclosure is scheduled to be completed not later than April 30, 2008 and defendants' expert disclosure is to be completed not later than May 23, 2008. This is the first request for an extension of the dates for expert disclosure.

The parties are in the process of concluding depositions of several non-party witnesses whose testimony is relevant for certain of the opinions to be expressed by the expert witnesses. In order to have the opportunity to take the depositions, obtain the transcripts and forward them to the experts for review, additional time is required. For the foregoing reasons, the parties jointly request the date

Honorable James C. Francis IV

April 29, 2008

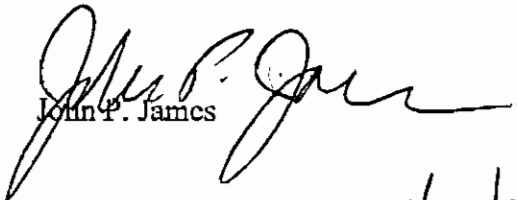
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for plaintiff's expert witness disclosure be extended to and including May 30, 2008 and defendants' date for expert disclosure be extend to and including June 23, 2008. //

Thank you for your consideration of the parties requests and we look forward to the Court's advices.

Respectfully,

FRIEDMAN & JAMES LLP


John P. James

JPJ:ll

cc: VIA FAX: 212-594-4589

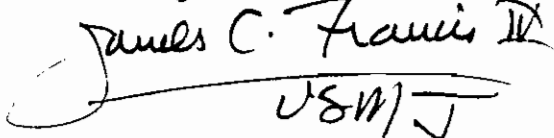
Edward P. Flood, Esq.

Lyons & Flood, LLP

Attorneys for Defendants

4/29/08
Application granted. In addition, all expert discovery shall be completed by July 25, 2008, and the pretrial order or any dispositive motion shall be submitted by August 22, 2008. If a dispositive motion is filed, the pretrial order shall be due thirty days after the motion is decided.

SO ORDERED

James C. Francis IV

USM/J